



Sustain Rural Wisconsin

December 9, 2015

Mr. Joe Baeten
Nutrient Management Program Coordinator
Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313 *Sent electronically as well as by postal service*

Mr. Baeten -

Rural communities around the state of Wisconsin have been following the UW-Extension Manure Irrigation Workgroup since its purposeful beginning over two years ago. As you know from personal experience, members of the Workgroup were asked to carefully review scientific studies on the consequences to human health when liquid manure is dispersed via aerial spraying systems.

Sustain Rural Wisconsin Network (SRWN) represents grassroots organizations from around the state that recognize the Workgroup's dedication and moral obligation to guard against any practice that exposes the people to the dangerous health impacts of manure disposal from livestock operations.

To our knowledge, neither DATCP nor its partners have officially announced conclusion of the Workgroup's meetings. When this occurs, we anticipate final recommendations for potential statewide policy regarding aerial spraying as a method of manure disposal. We expect the opportunity to respond via a public hearing at that time.

SRWN is continuing to gather studies documenting the dangers inherent in exposure to deadly pathogens and other health hazards associated with livestock manure.

It is alarming, therefore, to learn that DNR has issued a manure irrigation update to Central Sands Dairy dated 9/28/15 which represents considerable field expansion for the CAFO's manure disposal via aerial spraying. This approval, issued **prior to completion of the Workgroup's recommendations**, is a blatant disregard of the state resources and taxpayer dollars invested in convening and maintaining the Workgroup. Worse, this premature approval disregards the fact that the public health ramifications of spray irrigation as a practice are uncertain at best.

In addition, it would appear that DNR is not requiring groundwater monitoring or soil sampling at the site of this operation. We believe this constitutes a permit violation.

Other disturbing issues include the use of center pivot and end gun devices for spray application - day and night. Pressurized irrigation systems, as you know, increase the risk of pathogens becoming aerosolized. Scientific studies submitted to the Workgroup document less controlled, unpredictable manure dispersal when pressurized systems are in use.

Any state agency that knowingly allows an expert workgroup to de facto dissolve, or make meaningless recommendations, would likely be viewed as wasting state resources and deceiving public trust and expectations. Further, any state agency that knowingly gives its approval to endanger public health would likely be seen as engaging in criminal conduct.

To prevent these unfortunate suspicions, SRWN requests a public hearing to allow for a respectful presentation of various viewpoints on the approval for the manure irrigation expansion issued to Central Sands Dairy. Until that public hearing is held and all comments and new pertinent materials are reviewed, we request a suspension of the CAFO's manure irrigation expansion.

Thank you sincerely for your response.

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CC: Professor Genskow - *please share with all members of the Workgroup*
Governor Scott Walker
Tressie Kamp, Staff Attorney, Midwest Environmental Advocates
Secretary Cathy Stepp, WDNR
Secretary Ben Brancel, DATCP
Secretary Kitty Rhoades, WI Department of Health Services
Deputy Secretary Kurt Thiede, WDNR
Preston Cole, Chair WI Natural Resources Board
Lee Engelbrecht, WI Towns Association
Stephanie Klett, WI Department of Tourism
Cheryl Burdett, US EPA
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Susan Hedman, US EPA